

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions Naming St. Thomas Outpatient Neurosurgical Center
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SECOND AMENDED DEPOSITION NOTICE

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Plaintiffs' Steering Committee ("PSC") will take the deposition of Larry E. Patterson, M.D., on Friday, March 18, 2016 at 10:30 a.m. at the office of Cynthia Wilson, Esq., located at 230 N. Washington Avenue Cookeville, TN. This will amend the previous Deposition Notice identifying a Crossville, Tennessee address. The deposition will be recorded by stenographical means and by video. A request for records is attached as Exhibit A hereto.

Dated: February 29, 2016

Respectfully submitted,

/s/ Benjamin A. Gastel

J. Gerard Stranch, IV
Benjamin A. Gastel
BRANSTETTER, STRANCH & JENNINGS PLLC
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203
Telephone: (615) 254-8801
Facsimile: (615) 255-5419
gerards@bsjfirm.com
beng@bsjfirm.com

*Plaintiffs' Steering Committee and Tennessee State
Chair*

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: February 29, 2016

/s/ Benjamin A. Gastel

Benjamin A. Gastel

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness Larry E. Patterson, M.D., (“You” or “Mr. Patterson”), to produce the following documents at least seven days prior to his deposition:

1. All documents containing facts or data that You considered in forming Your expert opinions.
2. All documents containing facts or data that the underlying party’s attorney provided to You and that You considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which You relied.
4. All exhibits that You intend to use to summarize or support his opinions.
5. All materials relevant to Your opinions and Your expert report in this case.
6. A list of all publications You authored in the previous 10 years.
7. A list of all other cases in which You have testified as an expert at trial or by deposition within the previous 4 years.
8. All communications and documents relating to compensation for Your study, report, and/or testimony.
9. All non-privileged communications relating to Your report.
10. Your current resume and curriculum vitae.

